

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**MICHAEL COREY JENKINS, et al.**

**PLAINTIFFS**

**v.**

**CAUSE NO. 3:23cv374-DPJ-FKB**

**RANKIN COUNTY, MISSISSIPPI, et al.**

**DEFENDANTS**

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**NOTICE OF ATTORNEY APPEARANCE**

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**NOW COMES** Jason E. Dare of Biggs, Ingram & Solop, PLLC, and first asserting any and all available defenses pursuant to FED. R. CIV. P. 12(b)(1) through 12(b)(7), and further reserving any and all rights of Defendants, Rankin County, Mississippi and Sheriff Bryan Bailey, in his individual and official capacities, pursuant to the Mississippi Tort Claims Act (MISS. CODE ANN. § 11-46-1 *et seq.*) and/or qualified, absolute, and sovereign immunity, and to object to standing, process, service of process, res judicata, collateral estoppel, prematurity, ripeness, laches, unclean hands, and equitable estoppel, as well as any applicable statute of limitations and/or limitations of action, files this, his Entry of Appearance as counsel on behalf of Rankin County, Mississippi and Sheriff Bryan Bailey, in his individual and official capacities.

**RESPECTFULLY SUBMITTED**, this 8<sup>th</sup> day of September, 2023.

**RANKIN COUNTY, MISSISSIPPI AND SHERIFF  
BRYAN BAILEY, IN HIS INDIVIDUAL AND  
OFFICIAL CAPACITIES - DEFENDANTS**

**BY:** /s/ Jason E. Dare  
**JASON E. DARE**

**OF COUNSEL:**

Jason E. Dare (MSB No. 100973)

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